Responsive to paragraphs 1 and 2 of the Official Action, a certified copy of the priority document has been requested from the client again but has not yet been received. The certified copy will be forwarded as soon as it is received from the client.

Paragraph 5 of the Official Action acknowledged that the Tan et al. reference is not valid prior art in this patent application (pending submission of the certified copy of the priority document).

Reconsideration is respectfully requested of the rejection of claims 1-18 under 35 U.S.C. 103(a) as being allegedly unpatentable over Bittinger, et al. (U.S.P. 5,754,774) in view of Skeen, et al. (U.S.P. 5,557,798) and Khan, et al. (U.S.P. 6,157,934).

Bittinger et al.

Applicant submits again that the primary reference Bittinger et al. (US 5,754,774) does not relate specifically to workflow management systems at all. Instead, Bittinger et al. employs the World Wide Web while using existing communication protocols and languages in a low speed communication system without requiring any modifications to existing web browsers or web servers. Bittinger et al. increases the performance of a web browser of a first computer which then communicates, using the Hyper-Text Transfer Protocol (HTTP), with a web server of a second computer. An HTTP data stream corresponding to a communication originated by the web browser of the first computer is intercepted prior to transmission of the HTTP data stream over the external communication link to the web server of the second computer. The intercepted HTTP data stream is converted from the HTTP protocol to a client/server specific communication protocol, and the converted client /server specific data stream is then transmitted to the second computer. The

second computer converts the client/server specific data stream to the original HTTP data stream which is then provided to the web server of the second computer.

Thus, Bittinger, et al. provides a general communication system not specifically related to workflow management applications as explained in the present specification on pages 1-5.

Pages 5 and 6 of the Official Action acknowledge that Bittinger et al. fails to disclose a workflow management application in which a first server computer runs a first workflow management system application wherein a first work task is part of a first workflow instance, and a second server computer runs a second workflow management system application. Further wherein a first connector application comprises a first mapping table including a first service terminology and a common terminology, and a copy of a second connector application comprises a second mapping table including a second service terminology and the common terminology. Further wherein the first work task is transposed by the first mapping table, and the marshaled input data is transposed to a second work task by the second mapping table from the common terminology, such that the marshaled input data is processed by the second workflow management system.

The rejection then attempts to reconstruct these and other features of the present invention which provides an interconnect of a first workflow management system and a second workflow management system by relying upon Skeen et al. and Khan et al.

Skeen et al.

Skeen et al. is also not related specifically to workflow management systems and applications, and instead relates generally to (Summary of the Invention) a

communication interface for decoupling one software application from a second software application to allow communications between the different software applications. The communication interface is comprised of first and second libraries of programs. A first data exchange library manages self-describing forms which contain actual data to be exchanged as well as type information regarding data format and class definition. A second communications library manages communications, and includes a subject mapper to receive subscription requests regarding a particular subject and maps them to particular communication disciplines and to particular services supplying this information.

The functions of the interface are carried out by programs or subroutines in the first and second libraries which together comprises the interface.

The data exchange library of the communication interface allows a first process using data records or forms having a first format to communicate with a second process which has data records having a second, different format without the need for the first process to know or to be able to deal with the format used by the second process.

The data-exchange library of the communication interface includes a forms-manager module and a forms-class manager module. The forms-manager module handles the creation, storage, recall and destruction of instances of forms and calls to the various functions of the forms-class manager. The forms-class manager handles the creation, storage, recall, interpretation, and destruction of forms-class descriptors which are data records.

The communications library uses subject mapping, and receives "subscribe" requests from an application which specifies the subject upon which data is requested. A subject-mapper module then looks up the subject in a database which stores "service records"

which indicate the various server processes that supply data on various subjects, and identifies an appropriate service record.

Thus Skeen et al. fails to specifically disclose workflow management applications, and it is quite evident that the prior art rejection attempts to apply Skeen et al. to the general system of workflow management applications through clear hindsight and only through the benefit of the disclosure and teachings of the present invention.

Kahn et al.

Kahn, et al. (U.S.P 6,157,934) is the only applied reference which relates specifically to a workflow application, and discloses a server/client architecture (one server computer = main server (cf. col. 2, line 2) and a plurality of client computers) wherein a single workflow application is processed. In contrast thereto, the present invention relates to and provides an interface between different workflow management systems (first server computer 112 and second server computer 122), each connected to at least one client computer 111, 121, and further wherein each different workflow management system has its own workflow management system application 3, 4 with an interaction between the different workflow management systems. Kahn, et al. does not disclose or discuss a similar interaction between different workflow management systems.

It is quite apparent, based upon the above descriptions of Bittinger et al, Skeen et al. and Kahn et al. that the prior art rejection is based wholly upon a hindsight approach of attempting to reconstruct the claimed tenets of the present invention through hindsight and with the clear benefit of the teachings of the present invention, and accordingly reconsideration is respectfully requested of the prior art rejection.

This application is now believed to be in condition for allowance, and a Notice of Allowance is respectfully requested. If the Examiner believes a telephone conference might expedite prosecution of this case, it is respectfully requested that he call applicant's attorney at (516) 742-4343.

Respectfully submitted,

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